

Ken Herstowski



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

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May 24, 2011

RCAP RECEIVED  
MAY 31 2011

Mr. David R. Zoghby  
Senior Director of Marketing  
EBV Explosives Environmental Company  
P.O. Box 1386  
Joplin, MO 64802



RE: Submittal of Completed Release Report – Building #3, Air Pollution Control System  
EBV Explosives Environmental Company, Joplin, Missouri  
EPA ID# MOD985798164

Dear Mr. Zoghby:

The Missouri Department of Natural Resources' (Department) Hazardous Waste Program received a Release Report, dated January 11, 2011, documenting activities conducted from a release that occurred on September 24, 2010. The Department is requesting EBV Explosives Environmental Company (EBVEEC) conduct additional sampling and respond to the following comments:

1. EBVEEC should have conducted confirmation sampling for all constituents listed in *Special Permit Condition II. I. Thermal Treatment Unit Emission Standards* of the Missouri Hazardous Waste Management Facility Permit as modified (Permit) August 19, 2009. EBVEEC conducted sampling for total cadmium, chromium, and lead as well as chloride. The sampling results for the above constituents are within background levels for soils in the Joplin, Missouri, area.
2. EBVEEC shall conduct additional sampling to include total metals analysis for mercury, arsenic, beryllium, and selenium as well as perchlorates. Selenium is being requested because it was included on the manifest for disposal of the incinerator ash as indicated in Appendix #4. EBVEEC shall sample for hexavalent chromium, in soils, or provide documentation that EBVEEC has never handled materials containing hexavalent chromium in the Propellant Thermal Treatment Unit of Building #3. Three samples shall be collected in the area of previous samples on the Expert Management, Incorporated,

property (41/42, 43/44, and 49/50) and three samples shall be collected in the area of previous samples on the EBVEEC property (31/32, 33/34, and 35/34\*).

\*Location 35/34 on the map in Appendix #3 appears to be labeled in error; should this be 35/36? EBVEEC shall correct this error if it has been incorrectly labeled.

3. EBVEEC shall also collect four soil samples from the gravel area shown on the map in Appendix #3 and analyze the samples for selenium, perchlorate, and all constituents listed in *Special Permit Condition II. I. Thermal Treatment Unit Emission Standards* from the Permit. Selenium is being requested because it was included on the manifest for disposal of the incinerator ash as indicated in Appendix #4. See Comment Number 2 above for additional information on hexavalent chromium analysis.
4. EBVEEC shall collect three samples for dioxin and furan analysis. One sample from each of the following areas:
  - The area of previous samples on the Expert Management, Incorporated, property;
  - The area of previous samples on the EBVEEC property; and
  - The gravel area on the EBVEEC property as explained in Comment #3 above.
5. EBVEEC shall provide a sampling plan to the Department, to include (at a minimum) constituents, the U.S. Environmental Protection Agency sampling methods, collection methods, and locations for sampling for review and approval prior to conducting additional sampling at the Building #3 release area in accordance with Corrective Action Condition III. of the Permit.
6. EBVEEC shall explain why the chloride samples were diluted ten times as indicated in the analytical results from Appendix #7.
7. In accordance with Corrective Action Condition II. and III. of the Permit, EBVEEC shall provide a sampling plan to the Department for review and approval for any future releases on the property prior to conducting confirmation sampling for a release from any existing or newly identified solid waste management unit or area of concern. This requirement should not prevent EBVEEC from conducting remedial action to eliminate immediate threats to human health or the environment without prior Department approval.

Mr. David R. Zoghby  
May 24, 2011  
Page 3

If you have any questions regarding this letter, please contact me at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at 573-751-3553. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM



Mike Dandurand  
Environmental Engineer  
Permits Section

MD:mj

c: Ken Herstowski, P.E., U.S. EPA Region 7 ✓  
Southwest Regional Office, Missouri Department of Natural Resources